

HEARING DATE AND TIME: July 19, 2012 at 9:45 a.m. (Eastern Time)
OBJECTION DEADLINE: June 29, 2012 at 5:00 p.m. (Eastern Time)
REPLY DEADLINE: July 11, 2012 at 5:00 p.m. (Eastern Time)

KING & SPALDING LLP
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Arthur Steinberg
Scott Davidson

Counsel for General Motors LLC

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:	:	Chapter 11
	:	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> , f/k/a General Motors Corp., <i>et al.</i>	:	Case No.: 09-50026 (REG)
	:	(Jointly Administered)
Debtors.	:	
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MOTORS LIQUIDATION COMPANY GUC	:	
TRUST,	:	
	:	
Plaintiff,	:	Adversary Proceeding
	:	Case No.: 12-09802 (REG)
v.	:	
	:	
APPALOOSA INVESTMENT LIMITED	:	
PARTNERSHIP, <i>et al.</i> ,	:	
	:	
Defendants.	:	
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**NOTICE OF MOTION BY GENERAL
MOTORS LLC FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that upon (i) the *Motion by General Motors LLC for Summary Judgment* ("Motion"); (ii) the *Memorandum of Law in Support of the Motion by General Motors LLC for Summary Judgment*; (iii) the *Declaration of Lawrence S. Buonomo in Support of Motion for Summary Judgment*; (iv) the *Declaration of Scott I. Davidson in Support*

*of Motion for Summary Judgment; (v) the Statement of Undisputed Material Facts Pursuant to Local Rule 7056-1 in Support of Motion by General Motors LLC for Summary Judgment; and (vi) the Compendium of Exhibits, each filed simultaneously herewith, General Motors LLC (“New GM”), will move before the Honorable Robert E. Gerber, United States Bankruptcy Judge, in Room 621 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on **July 19, 2012 at 9:45 a.m.**, or as soon thereafter as counsel can be heard, for entry of an order granting it summary judgment on certain issues raised by the Motors Liquidation Company GUC Trust in its Claims Objection filed in the above-referenced contested matter.*

PLEASE TAKE FURTHER NOTICE, that pursuant to the briefing schedule established by the parties and approved by the Court, any response or objection to the Motion must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-242 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court’s filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov), and served in accordance with General Order M-242, and on King & Spalding LLP, 1185 Avenue of the Americas, New York, New York 10036 (Attn: Arthur Steinberg, Esq. and Scott Davidson, Esq.) so as to be received no later than **June 29, 2012, at 5:00 p.m. (Eastern Time)** (the “**Objection Deadline**”).

PLEASE TAKE FURTHER NOTICE that pursuant to the briefing schedule established by the parties and approved by the Court, any reply shall be filed and served by **July 11, 2012 at 5:00 p.m. (Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that if no objections or responses are timely filed and served with respect to the Motion, New GM may, on or after the Objection Deadline, submit to the Bankruptcy Court an order granting the relief requested in the Motion, and such order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: New York, New York
June 8, 2012

KING & SPALDING LLP

By: /s/ Arthur Steinberg
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